

1 THE HONORABLE JAMES L. ROBART
2
3
4
5
6
7
8

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

9 SRC LABS, LLC & SAINT REGIS
MOHAWK TRIBE,
10
11 Plaintiffs,

12 v.
13 AMAZON WEB SERVICES, INC.,
AMAZON.COM, INC.,
& VADATA INC.
14
15 Defendants.

Case No.: 2:18-cv-00317-JLR

PLAINTIFFS' UNOPPOSED MOTION
AND ~~PROPOSED~~ ORDER TO
MODIFY CLAIM CONSTRUCTION
SCHEDULE

NOTE ON MOTION CALENDAR:
October 22, 2018

JURY TRIAL DEMANDED

16 Plaintiffs SRC Labs, LLC & Saint Regis Mohawk Tribe (collectively, "Plaintiffs")
17 submit this motion to request the following modifications to the Court's Claim Construction
18 Schedule as modified on August 30, 2018 (Dkt. No. 103) (the "Order").

| Event | Current Deadline | Modified Deadline |
|--|------------------|-------------------|
| Joint claim chart and Prehearing Statement | 10/24/18 | 10/31/18 |

21 Good cause exists for this extension because Plaintiffs need additional time to obtain and
22 cite to the transcripts of the experts that were deposed on October 17th-20th. The proposed
23 modifications do not change the date of the *Markman* hearing and will not require modifying any
24 other deadlines set forth in the Court's Order. Defendants Amazon Web Services, Inc.,
25 Amazon.com, Inc. & VADATA Inc. do not oppose this motion.

26
27
28 MOT. TO MODIFY
CLAIM CONSTRUCTION SCHEDULE
CASE NO. 2:18-CV-00317-JLR

1

2 Dated: October 22, 2018

3 By: s/ Carmen E. Bremer

4 Carmen E. Bremer, WSBA 47,565
5 BREMER LAW GROUP PLLC
6 1700 Seventh Avenue, Suite 2100
7 Seattle, WA 98101
Telephone: 206.357.8442
Facsimile: 206.858.9730
Email: carmen.bremer@bremerlawgroup.com

8 Michael W. Shore (admitted pro hac vice)
9 Alfonso G. Chan (admitted pro hac vice)
Christopher Evans (admitted pro hac vice)
Andrew Howard (admitted pro hac vice)
10 SHORE CHAN DEPUMPO LLP
901 Main Street, Suite 3300
Dallas, TX 75202
Telephone: 214.593.9110
Facsimile: 214.593.9111
Email: mshore@shorechan.com
achan@shorechan.com
cevans@shorechan.com
ahoward@shorechan.com

11
12
13
14
15 Attorneys for Plaintiffs SRC Labs, LLC & Saint
16 Regis Mohawk Tribe
17
18
19
20
21
22
23
24
25
26
27
28

[PROPOSED] ORDER

This matter is before the Court on Plaintiffs' Unopposed Motion to Modify Claim Construction Schedule. The Court, having considered this matter and the record in this case, ORDERS as follows:

The Motion is GRANTED in its entirety.

IT IS HEREBY ORDERED THAT the claim construction deadlines are modified as follows.

| Event | Current Deadline | Modified Deadline |
|--|------------------|-------------------|
| Joint claim chart and Prehearing Statement | 10/24/18 | 10/31/18 |

SO ORDERED this 23 day of October, 2018

THE HONORABLE JAMES L. ROBART
UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of October, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/Carmen Bremer
Carmen Bremer